

stored data, including whole, pre-formed and animated sequences that may be compiled to form a new, customized training module. While this is a true statement of the teachings of Cook et al., this does not provide a teaching comparable to the element of apparatus claim 1, of a selection device that generates a training unit by combining a number of *said training modules*. In the subject matter disclosed and claimed in the present application, a number of *training modules* are stored. The term "training module" is intended to have its ordinary dictionary meaning, and represents a compilation of information that achieves its intended purpose, i.e., training someone to perform a particular task.

* By contrast, the data that are stored in the Cook et al. reference, and which can be selectively combined to form a training module, are not themselves training modules, but are only "dynamic clip art" stored in the form of data strips, as explicitly set forth at column 5, lines 56-57 of the Cook et al. reference. These items of clip art are explicitly stated earlier in the same passage to be created by "artists, animators, singers and so forth." Clearly these "artists, animators, singers and so forth" do not themselves have any capability or information which qualifies them to train another person to perform some type of task. These contributors or creators of the "clip art" merely provide "sound, voice, graphics, animation or video, or combinations of these," as explicitly stated at column 5, lines 61-63. Moreover, by their very nature, none of these "clip art" items have any useful dependency relative to each other, nor is there any teaching that such dependencies are stored. The user merely selects from this library of clip art a number of clip art items which the user believes would be appropriate for generating a training module. This is not the same as first storing a number of training modules, together with information identifying the dependencies

of these training modules on each other, and then combining a number of these stored training modules to generate a new training unit. The most that can be said of the Cook et al. reference is that it teaches assembling a number of “clip art” items to form a training module, but once this training module is formed, there is no teaching whatsoever in the Cook et al. reference that such a training module should be stored, together with dependencies on other training modules, for selective combination to form a larger training unit. The end result of the procedure or technique disclosed in the Cook et al. reference is a training module itself, and there is no teaching in the Cook et al. reference to generate a larger training unit from multiple training modules, dependent on the stored, respective dependencies of different training modules on each other, as set forth in claim 1 of the present application.

The Cook et al. reference, therefore, does not disclose all of the elements of claim 1 as arranged and operating in that claim, and therefore does not anticipate claim 1. Claims 2, 3, and 4 add further structure to the novel combination of claim 1, and therefore are not anticipated by the Cook et al. reference for the same reasons discussed above in connection with claim 1.

Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Cook et al. in view of Tatsuoka. As noted in Applicants’ previous response, the Examiner is relying on the Tatsuoka reference as teaching that an important aspect of building a combination of modules for training is the diagnosis of training participants with respect to their need for treatment of medical conditions. Applicants do not disagree with this basic information, but there is no teaching in the Tatsuoka reference to generate a training program or a training unit from multiple training

modules, and therefore Applicants do not agree that the Tatsuoka reference teaches that this basic information is “an important aspect of building a combination of modules for training” as characterized by the Examiner. Therefore, even if the Cook et al. reference were modified based on the teachings of Tatsuoka, an apparatus as set forth in claim 5, which embodies the subject matter of claim 1 therein, still would not result. Claim 5, therefore, would not have been obvious to a person of ordinary skill in the art under the provisions of 35 U.S.C. §103(a) based on the teachings of Cook et al. and Tatsuoka.

Claim 6 was rejected under 35 U.S.C. §102(e) as being anticipated by Wall et al. This rejection is respectfully traversed for the following reasons.

The Wall et al. reference teaches storing “a plurality of self-containing multimedia lesson plans, on-line help screens, trouble shooting modules, test/quiz portions, appropriate technology background information, glossaries, etc.” (Wall et al., column 5, lines 15-19). The Wall et al. reference, however, represents the problem in the art which the present invention of claim 6 is intended to overcome, namely that the user is presented with the daunting task of having to make selections from (potentially) *every one* of these stored items. This is made clear in the passage at column 4, lines 42-58 of the Wall et al. reference, wherein it is stated that the intention of the system disclosed in the Wall et al. reference is “for facilitating maximum user flexibility,” and “the end-user is capable of selecting *any lesson plan* as well as executing *only a portion of a training session* at any point in the course where depending upon the need.” The user, therefore, must select which lesson plan is desired, and/or must designate which portion of a training session, is/are to be used. There is no disclosure or teaching in the Wall et al. reference of a training

method for *automatically* determining and meeting the needs of training participants. The Wall et al. system makes a large number of selections available to an end user, but it is up to the end user to ultimately make the selection. Moreover, there is no teaching in the Wall et al. reference to determine all training modules that are responsive to a user's entry. The Wall et al. system, at least initially, assumes that every training session stored therein is possibly responsive to the user's entry, and it is up to the user to cull from among the available, stored sessions to customize a particular training program.

Additionally, claim 6 requires that an entry be made that includes, among other things, background knowledge of a training participant, and the computerized system then makes a selection that is dependent on the aforementioned background knowledge, and defines a training unit that is customized to the training participant from these multiple training modules.

There is no such automatic culling and combining procedure disclosed or suggested in the Wall et al. reference. As noted above, it is up to the user to ultimately select all items to be included in the training session, even though the user may be assisted in this procedure by a number of prompts.

The Wall et al. reference, therefore, does not disclose all of the method steps of claim 6, and in fact the underlying intent of the system disclosed in the Wall et al. (to provide maximum user flexibility) is counter to the automatic procedure that is set forth in claim 6. Claim 6, therefore, is not anticipated by the Wall et al. reference under the provisions of 35 U.S.C. §102(e).

The present Response does not raise any new issues requiring further searching or consideration, and is therefore properly enterable after the final rejection. Reconsideration of the application in view of the above comments is respectfully requested.

Submitted by,

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